

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:
Alvin J. Johnson

Debtor.

Chapter 13 No. 16-41277

Hon. Phillip J. Shefferly

OBJECTIONS TO CONFIRMATION

NOW COMES CIT Bank, N.A., by and through their attorneys, Trott Law, P.C., and hereby Objects to Confirmation as follows:

1. That Creditor is a holder of a reverse mortgage on real property owned by the debtor(s) and located at 6819 Covert St., Detroit, MI 48212-2013;
2. That according to the reverse mortgage, the loan is an Adjustable Rate Loan that secures repayment of a debt up to a maximum of \$85,500.00;
3. That according to Creditor's records, the debt of approximately \$72,438.96 is accruing interest and other monthly charges pursuant to the underlying mortgage and note;
4. That the Debtor's Plan of Reorganization proposes to pay Creditor in Class 5.2 as a Total Debt Claim of \$14,000.00 with 0% interest at \$274.51 per month;
5. That according to the Creditor's records, after application of all borrower payments, the pre-petition arrearage is approximately \$14,327.80;
6. That the loan held by Creditor is non-escrowed account and the Debtor must maintain the hazard insurance and taxes on the said property;
7. That the Debtor(s) failed to provide evidence of insurance and the Creditor has been forced to secure alternative insurance and advance approximately \$4,702.00 for said insurance;
8. That additionally, Creditor has advanced approximately \$10,330.80 to pay taxes and prevent the loss of the property;
9. That according to creditors records, Creditor has received approximately \$705.00 in payments from the Debtor;
10. That due to the Debtor's failure to maintain taxes and hazard insurance, Creditor is inadequately protected;

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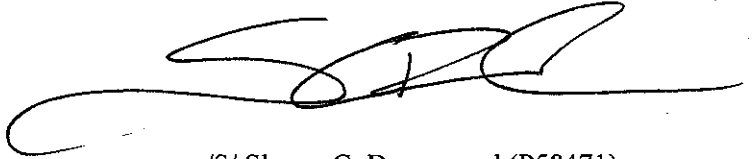
11. That Creditor needs to receive adequate assurance/protection that the debtor will pay future taxes as they become due in the form of a future default order;

12. That Creditor objects to total debt treatment in Class 5.2 as the mortgage does not mature until February 10, 2085;

WHEREFORE, Creditor prays that Confirmation be denied.

Respectfully Submitted,
Trott Law, P.C.

Dated: February 12, 2016



/s/ Shawn C. Drummond (P58471)
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